

**Ketel One  
VODKA**

June 21, 2005

Comment 106

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Attn: Notice No. 41,  
P. O. Box 14412  
Washington, DC 20044-4412

Dear Division Chief:

We are writing our comments in connection with the Division's above Notice request in regards to supplementary information. Our comments are in the same sequence as the general questions in the aforementioned Notice:

1. We believe that TTB should not require mandatory nutrition labeling information for alcohol beverages **other than the Serving Panel currently proposed**. Nutrition information should not be permitted on a voluntary basis as it may confuse consumers further.
2. We believe that TTB should not require mandatory ingredient labeling information for alcohol beverages other than is currently in effect. Additionally, ingredient labeling should not be permitted on a voluntary basis as it may confuse consumers further.
3. Based on the above responses we believe that no further research and evaluation is needed by TTB.
4. Other than requiring disclosure of the Serving Panel information, which is on a voluntary currently, TTB does not need any further modifications to current requirements regarding alcohol beverage labels to help consumers better understand and benefit from the information on the labels.
5. We submit no comments as we are not fully aware of all the alcohol beverage label requirements of other major producing nations.
6. Other than implementing the Serving Panel information, we believe that consumers are not likely to derive further benefits from more specific information on alcohol beverage labels.
7. We recommend that the Agency should implement the Serving Panel disclosure requirement.

**NOLET SPIRITS U.S.A.**

30 Journey  
Aliso Viejo, CA 92656

Tel: 800.243.3618  
949.448.5700  
Fax: 949.448.5733  
www.KetelOne.com





Page 2  
June 21, 2005

8. We strongly request that advertising and alcohol beverage labeling requirements be consistently applied to advertising as well.

We appreciate the opportunity to submit these comments and look forward to working with the Agency to improve the quality of alcohol beverage labeling requirements.

Sincerely your,

,e

William L. Eldien  
President

